



September 16, 2025

**VIA E-MAIL ONLY**

Jennifer M. Jones  
Deputy Executive Secretary  
Federal Deposit Insurance Corporation  
550 17th Street NW  
Washington, DC 20429

**Re: Proposed Revisions to Guidelines for Appeals of Material Supervisory Determinations RIN 3064–ZA50**

The Wisconsin Bankers Association (WBA) is the largest financial trade association in Wisconsin, representing nearly 180 state and nationally chartered banks, savings and loan associations, and savings banks. WBA appreciates the opportunity to comment on FDIC's proposed revisions to the Guidelines for Appeals of Material Supervisory Determinations (proposal).

WBA welcomes FDIC's efforts to improve the transparency, independence, and fairness of the supervisory appeals process. Wisconsin banks value a supervisory framework that is consistent, predictable, and grounded in sound judgment. The appeals process plays a critical role in ensuring that supervisory determinations are not only technically accurate but also contextually appropriate. WBA supports FDIC's proposal to reinstate a standalone Office of Supervisory Appeals.

There has long been interest in ensuring that the supervisory appeals process is meaningfully independent from the divisions responsible for making supervisory determinations. FDIC's proposal to establish a standalone Office of Supervisory Appeals reflects a thoughtful response to that concern. FDIC's proposal to establish a standalone Office of Supervisory Appeals reflects a thoughtful and responsive approach to this concern. By including reviewing officials from both government and private-sector backgrounds, FDIC promotes a balanced perspective.

WBA also appreciates FDIC's efforts to clarify the scope of appealable determinations. The inclusion of ratings, classifications, and informal enforcement actions reflects the types of supervisory judgments that can have significant implications for a bank's operations, reputation, and strategic planning. We encourage FDIC to continue refining these definitions to ensure that institutions have a clear and fair path to challenge determinations that materially affect their business.

At the same time, we urge FDIC to provide additional clarity regarding the interaction between supervisory appeals and formal enforcement actions. While we understand the need to preserve the integrity of enforcement processes, the current framework may prevent institutions from appealing ratings or determinations that are closely tied to enforcement-related findings. We recommend that FDIC consider mechanisms to allow for limited review of such determinations when appropriate, particularly in cases where enforcement actions are resolved or withdrawn.

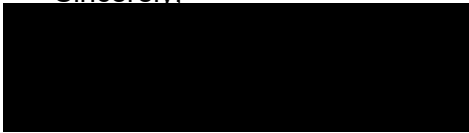
WBA appreciates FDIC's reaffirmation of its policy prohibiting examiner retaliation. This safeguard is essential to maintaining trust in the supervisory process. We encourage FDIC to continue monitoring for retaliation and to provide institutions with clear guidance on how to report concerns.



Finally, we appreciate FDIC's decision to establish clear timelines and procedures for appeals. Predictability in the review process allows banks to plan effectively and reduces regulatory uncertainty. We also support FDIC's commitment to publishing redacted decisions, which will promote transparency and help institutions understand how similar issues have been resolved.

In conclusion, WBA supports FDIC's proposed revisions and believes they will strengthen the supervisory appeals process for the industry. We appreciate the opportunity to provide input and look forward to continued collaboration with FDIC to ensure a fair and effective supervisory framework.

Sincerely,



Rose Oswald Poels  
President/CEO

